

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Alto Maipo Delaware LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No.: 21-11507 (KBO)

(Jointly Administered)

Docket Ref. No. \_\_\_\_\_

**ORDER GRANTING DEBTORS' MOTION FOR LEAVE TO FILE  
REPLIES TO OBJECTIONS TO THE DISCLOSURE STATEMENT  
AND ASSUMPTION OF THE RESTRUCTURING SUPPORT AGREEMENT**

Upon consideration of the motion (the "Motion")<sup>2</sup> of the above-captioned debtors and debtors in possession (collectively, the "Debtors") for entry of an order, pursuant to Local Rule 9006-1(d), allowing the Debtors to file both the *Debtors' Omnibus Reply in Support of Debtors' Motion for an Order (I) Approving the Disclosure Statement; (II) Approving Solicitation and Voting Procedures, Including (A) Fixing the Record Date, (B) Approving the Solicitation Packages and Procedures for Distribution, (C) Approving the Form of the Ballots and Establishing Procedures for Voting, and (D) Approving Procedures for Vote Tabulation; (III) Scheduling a Confirmation Hearing and Establishing Notice and Objection Procedures; and (IV) Granting Related Relief* (the "Disclosure Statement Reply") and the *Reply in Support of Debtors' Motion for Entry of an Order Authorizing Debtors to Assume Restructuring Support Agreement* (the "RSA Reply," and together with the Disclosure Statement Reply, the "Replies"); and it appearing that this Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number in the jurisdiction in which it operates, are: Alto Maipo SpA (761-2) (Chile) and Alto Maipo Delaware LLC (1916) (Delaware). The location of the corporate headquarters and the service address for Alto Maipo SpA is Los Conquistadores 1730, Piso 10, Santiago, Chile.

<sup>2</sup> Capitalized terms shall have the meanings ascribed in the Motion.

1334 and 157, and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated February 29, 2012; and it appearing that this is a core matter pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that due and adequate notice of the Motion has been given under the circumstances, and that no other or further notice need be given; and this Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is granted as set forth herein.
2. The Debtors are granted leave and are permitted to file the Replies, and other parties in interest are permitted to file joinders thereto.
3. This Court shall retain jurisdiction over any and all matters arising from or related to the interpretation or implementation of this Order.